

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**HANNAH CRAMER, et al.,**

**Plaintiffs,**

**v.**

**ARKESIA, INC. d/b/a CLUB ROUGE, et al.,**

**Defendants.**

**Case No. 3:18-cv-00039**

**JOINT MOTION FOR APPROVAL OF REVISED CONFIDENTIAL  
SETTLEMENT AGREEMENT AND DISMISSAL OF  
PLAINTIFF’S AMENDED COMPLAINT WITH PREJUDICE**

COMES NOW Plaintiffs Hannah Cramer, Jessica Blakley, Shernell Crutchfield, and Opt-In Plaintiffs (collectively “Plaintiffs”) and Defendants Arkesia, Inc. d/b/a/ Club Rouge, Circle 2, Inc. d/b/a Daddy Rabbits, Circle 2, Inc. d/b/a Candy Bar, Imaginary Images, Inc. d/b/a Paper Moon, BTF3 LLC d/b/a Papermoon, M.G.B., Inc. d/b/a Pure Pleasure, William Andreas Pyliaris, and and/or any other entities affiliated with or controlled by Arkesia, Inc. d/b/a/ Club Rouge, Circle 2, Inc. d/b/a Daddy Rabbits, Circle 2, Inc. d/b/a Candy Bar, Imaginary Images, Inc. d/b/a Paper Moon, BTF3 LLC d/b/a Papermoon, M.G.B., Inc. d/b/a Pure Pleasure, and William Andreas Pyliaris (collectively “Defendants”) (collectively “Parties”), jointly move the Court for an order approving the agreements between the parties to resolve this case and dismissing Plaintiff’s Amended Complaint with prejudice.

**Respectfully submitted,**

**HANNAH CRAMER, JESSICA BLAKLEY,  
SHERNELL CRUTCHFIELD, AND OPT-IN  
PLAINTIFFS**

By: \_\_\_\_\_/s/

Justin P. Keating  
Beans Axelrod, PC  
1030 15<sup>th</sup> Street, N.W. Suite 700  
Washington, D.C. 20005  
Tel: (202) 328-7222

By: \_\_\_\_\_/s/

Lloyd R. Ambinder (*Pro Hac Vice Admission*)  
LaDonna Lusher (*Pro Hac Vice Admission*)  
Virginia & Ambinder, LLP  
40 Broad Street, 7th Floor  
New York, New York 10004  
Tel: (212) 943-9080  
*Counsel for Plaintiffs*

**ARKESIA, INC. D/B/A CLUB ROUGE,  
CIRCLE 2, INC. D/B/A DADDY RABBITS,  
CIRCLE 2, INC. D/B/A CANDY BAR,  
IMAGINARY IMAGES, INC. D/B/A PAPER  
MOON, BTF3, INC. D/B/A PAPERMOON,  
MGB., INC. D/B/A PURE PLEASURE,  
AND/OR ANY OTHER ENTITIES  
AND WILLIAM ANDREAS PYLIARIS**

By: \_\_\_\_\_/s/

Thomas M. Lucas (VSB No. 27274)  
Kristina H. Vaquera, Esq. (VSB No. 43655)  
Milena Radovic, Esq. (VSB No. 91000)  
Jackson Lewis, PC  
500 E. Main Street, Suite 800  
Norfolk, Virginia 23510  
Telephone: (757) 648-1445  
Facsimile: (757) 648-1418  
E-mail: thomas.lucas@jacksonlewis.com  
vaquerak@jacksonlewis.com  
milena.radovic@jacksonlewis.com  
*Counsel for Defendants*

**Certificate of Service**

I hereby certify that on November 12, 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system which then send a notification of such filing (NEF) to opposing counsel as follows:

Thomas M. Lucas (VSB No. 27274)  
Kristina H. Vaquera, Esq. (VSB No. 43655)  
Milena Radovic, Esq. (VSB No. 91000)  
Jackson Lewis, PC  
500 E. Main Street, Suite 800  
Norfolk, Virginia 23510  
thomas.lucas@jacksonlewis.com  
vaquerak@jacksonlewis.com  
milena.radovic@jacksonlewis.com  
*Counsel for Defendants*

**HANNAH CRAMER, JESSICA BLAKLEY,  
SHERNELL CRUTCHFIELD, AND OPT-IN  
PLAINTIFFS**

By: \_\_\_\_\_/s/  
Justin P. Keating  
Beans Axelrod, PC  
1030 15<sup>th</sup> Street, N.W. Suite 700  
Washington, D.C. 20005  
Tel: (202) 328-7222  
*Counsel for Plaintiffs*